United Nations ST/SG/AC.10/C.3/2018/13

Secretariat

Distr.: General
22 March 2018

Original: English

Committee of Experts on the Transport of Dangerous Goods and on the Globally Harmonized System of Classification and Labelling of Chemicals

Sub-Committee of Experts on the Transport of Dangerous Goods

Fifty-third session

Geneva, 25 June-4 July 2018
Item 3 of the provisional agenda
Listing, classification and packing

Classification of self-inflating recovery devices

Transmitted by the expert from Germany*

Introduction

1. At the fifty-second session of the Sub-Committee, the expert from Germany presented a proposal for a possible classification of self-inflating recovery devices, see document ST/SG/AC.10/C.3/2017/29. Some experts were in favour of the proposal to extend the name and description of UN No. 2990 to include self-inflating recovery devices and make a consequential amendment to special provision 296. However the majority believed that the life-saving appliances entry should remain limited to appliances performing a life-saving function.

2. Self-inflating flotation devices are used for salvaging measuring devices for use under water. Such underwater measuring devices include, for instance, so-called streamers that are deployed on the seabed within the framework of seismic exploration. At the end of the exploration, these measuring instruments are brought back to the surface of the sea by means of a so-called streamer recovery device (SRD).

3. The SRD includes a refillable gas cylinder that is opened by means of an activation device so that the gas can flow into several gas-tight bags thus increasing the buoyancy of the streamer. SRDs usually contain an igniter, batteries and gases of class 2.2. German authorities got a request on the classification for a device containing UN 1013, Carbon

* In accordance with the programme of work of the Sub-Committee for 2017-2018 approved by the Committee at its eighth session (see ST/SG/AC.10/C.3/100, paragraph 98 and ST/SG/AC.10/44, paragraph 14)

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dioxide, an igniter classified as UN 0454, 1.4 S and two 3 V manganese lithium primary batteries, UN 3090. Detailed information on the streamer recovery device is given in informal document 6.

4. A correct classification in accordance with the current edition of the Model Regulations is not possible. The assignment to UN 3363 dangerous goods in machinery or dangerous goods in apparatus presupposes that the contained dangerous goods may be transported in a limited quantity and that the limits for limited quantities are complied with. These conditions are not complied with in the present case. The new UN numbers 3537 to 3548 for articles containing dangerous goods cannot be used either, as 2.0.5.4 precludes their application to goods of Class 1. This is why an amendment to the Model Regulations is necessary.

5. The following options could be considered:

Option 1:

6. Extend the scope of application of entry UN 2990 life-saving appliances, self-inflating, Class 9: the self-inflating recovery devices have the same functionality as life-saving appliances and contain the same dangerous goods as self-inflating life-saving appliances, the only difference being their intended use. Special provision 296 limits the dangerous goods that may be contained in such an article.

Option 2:

7. Extend the scope of application of entry UN 0503 safety devices, pyrotechnic, Class 1, and of entry UN 3268 safety devices, electrically initiated, Class 9: the articles covered by these UN numbers such as air bag modules or air bag inflators also function in a similar way to self-inflating recovery devices.

Option 3:

8. Introduce a new UN number in Class 1: the other dangerous goods contained in the device would have to be regulated in a special provision.

Option 4:

9. Introduce a new UN number in Class 9: the other dangerous goods contained in the device would have to be regulated in a special provision.

Option 5:

10. Introduce an exception for self-inflating recovery devices: this could be done by assignment in accordance with options 1, 2, 3 or 4 and introducing an exception in a special provision.

Next steps

11. The Sub-Committee is invited to present its views on the possible options for evolving the regulations. The expert from Germany is willing to prepare a new proposal for the next meeting taking the views stated into account.